

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Monica Cecilia TREVINO

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 19, 2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

8 USC 1324

Offense Description

knowingly and in reckless disregard of the fact that an alien has come to, entered, or remained in the United States in violation of law, did transport and move, attempt to transport and move, and conspire to transport and move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

On or about October 19, 2021, at approximately 3:30 am, defendant Monica Cecilia TREVINO, a United States Citizen, applied for admission into the United States at the Lincoln Juarez Port of Entry in Laredo, Texas driving her he privately owned vehicle. Defendant was accompanied by 2 minors whom she identified as her U.S. Citizen children. CBP Officer Jay Salazar referred all of the occupants to secondary for a further inspection due to back door not opening. At secondary inspection, CBP Officer Jay Salazar continued with the inspection and found a female to be hidden under a deflated mattress. The female hidden was identified as Leticia LOPEZ-Luna an undocumented citizen & national of Mexico. LOPEZ-Luna stated she contacted her friend (the defendant) TREVINO to help her enter the United States and that they mutually agreed she would hide in the car. Facts are based on LOPEZ-Luna's sworn statement and records of the Customs & Border Protection Service.

☐ Continued on the attached sheet.

/s/ Cynthia C. O'Bryant

Complainant's signature

Cynthia C. O'Bryant, CBP Enforcement Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: October 21 2021

Judge's signature

City and state: Laredo, Texas

Diana Song Quiroga, U.S. Magistrate Judge

Printed name and title